

ATTACHMENT 4 FLORIDA OSS TEST OBSERVATIONS AND EXCEPTIONS COMPARED TO GEORGIA OSS TEST

Performance Measures

Obs	Test #	Description	Comments
2	PMR-5 (7/25/00 to 8/23/00)	KPMG cannot replicate the values in the % rejected service requests (5/00).	Test area included in Georgia Test. See Georgia exception 45 (3/31/00 to 8/2/00). Exception 46 (4/6/00 to 12/14/00). Exception 52 (4/12/00 to 12/14/00).
3	PMR-5 (8/8/00 to 8/23/00)	KPMG cannot replicate the values in the reject interval for non-trunks (5/00).	Test area included in Georgia Test. See Georgia exception 45 (3/31/00 to 8/2/00). Exception 46 (4/6/00 to 12/14/00). Exception 52 (4/12/00 to 12/14/00).
4	PMR-5 (8/8/00 to 8/23/00)	KPMG cannot replicate the values in the Ordering FOC timeliness for non-trunks (5/00).	Test area included in Georgia Test. See Georgia exception 23 (2/11/00 to 1/5/01). Exception 46 (4/6/00 to 12/14/00). Exception 52 (4/12/00 to 12/14/00). Exception 62 (4/26/00 to 11/14/00). Exception 90 (5/30/00 to 12/14/00). Exception 110 (8/8/00 to 1/5/01).
5	PMR-5 (8/29/00 to 10/25/00)	KPMG cannot replicate the values in the Average Completion Interval /Distribution (5/00).	Test area included in Georgia Test. See Georgia exception 46 (4/6/00 to 12/14/00). Exception 62 (4/26/00 to 11/14/00). Exception 86 (5/8/00 to open). Exception 90 (5/30/00 to 12/14/00).
6	PMR-4 8/30/00 to 3/28/01)	BST does not properly construct the processed data used to validate certain ordering service quality measurements---systematically excludes the entire weekend.	See Exception 36 below.
7	PMR-5 (9/7/00 to 12/14/00)	KPMG cannot replicate the values in Average Completion Notice Interval (5/00).	Test area included in Georgia Test. See Georgia exception 86 (5/8/00 to open). Exception 110 (8/8/00 to 1/5/01).
8	PMR-5 9/19/00 to 10/18/00)	KPMG cannot replicate the values in E911 (5/00).	Test area included in Georgia Test. See Georgia exception 52 (4/12/00 to 12/14/00).
9	PMR 4&5 (9/21/00	KPMG does not properly construct the processed data used to validate the total service order cycle time (5/00).	Test area included in Georgia Test. Exception 46 (4/6/00 to 12/14/00).

	to 10/18/00)		Exception 62 (4/26/00 to 11/14/00). Exception 86 (5/8/00 to open). Exception 111 (9/11/00 to 1/5/01).
11	PMR-5 10/25/00 to 3/21/00: escalated to exception)	KPMG cannot replicate LNP - % rejected service requests metric (5/00).	Not included in Georgia Test.
12	PMR-5 10/25/00 to 12/6/00; escalated to exception)	KPMG cannot replicate LNP – reject interval metric (5/00).	See Exception 10 below.
13	PMR-3 (11/3/00 to 12/14/00)	BST does not notify CLECs when they make changes to historical performance reports a/d or raw data.	Included in Georgia Test. See Georgia exception 3 which was closed, re-opened and closed again. (12/15/99 to 2/10/00) and (3/29/00 to 6/16/00).
14	PMR-5 (11/3/00 to open)	KPMG cannot replicate LNP – missed appointments metric (5/00).	Not included in Georgia Test.
15	PMR-5 (11/14/00 to 3/21/00; escalated to exception)	KPMG cannot replicate LNP-Disconnect Timeliness metric (5/00).	Not included in Georgia Test.
16	PMR-5 (11/14/00 to 12/6/00; escalated to exception)	KPMG cannot replicate LNP FOC Timeliness (5/00).	Not included in Georgia Test.
17	PMR-5 (11/30/00	KPMG cannot replicate % missed appointments (5/00).	Test area included in Georgia Test. See exception 86 (5/8/00 to open).

	to 2/7/01)		
18	PMR-5 11/30/00 to 2/7/01)	KPMG cannot replicate M&R customer trouble report rate (5/00).	Test area included in Georgia Test. See exception 86 (5/8/00 to open).
19	PMR-5 (11/30/00 to 1/24/01)	KPMG cannot replicate Average Jeopardy Notice metric (5/00).	Test area included in Georgia Test. See Georgia exception 110. (8/8/00 to 1/5/01).
20	PMR-5 (11/30/00 to 1/24/01)	KPMG cannot replicate Mean Held Order Interval metric (5/00).	Test area included in Georgia Test. See Georgia exception 23 (2/11/00 to 1/5/01). Exception 52 (4/12/00 to 12/14/00).
22	PMR-5 (12/15/00 to 4/11/01)	KPMG cannot replicate Coordinated Cutovers metric (9/00).	Test area included in Georgia Test. See Georgia exception 52 (4/12/00 to 12/14/00). Exception 90 (5/30/00 to 12/14/00). Exception 100 (7/5/00 to 10/30/00).
23	PMR-5 (12/15/00 to 2/28/01)	KPMG cannot replicate Reject Interval – Trunks metric (10/00).	Test area included in Georgia Test. No exceptions issued.
24	PMR-5 (12/15/00 to 3/7/01)	KPMG cannot replicate Provisioning Troubles (Trunks) within 30 days metrics (5/00).	Test area included in Georgia Test. See Georgia exception 86 (5/8/00 to open).
25	PMR-5 1/9/01 to 3/21/01; escalated to exception)	KPMG cannot replicate LNP Total Service Order Cycle Time (5/00).	Not included in Georgia Test.
28	PMR-5 (1/17/01 to 1/31/01)	KPMG cannot replicate OS/DA speed to answer metric (5/00).	Test area included in Georgia Test. No exception issued.
31	PMR-5 (1/22/01 to 3/7/01)	KPMG cannot replicate 3 collocation measures (5/00).	Test area included in Georgia Test. No exception issued.
32	PMR-5 (1/24/01 to 3/27/01;	KPMG cannot replicate Provisioning Troubles (non-Trunks) within 30 days metrics (5/00).	See exception 27 below.

	escalated to exception		
57	PMR-5 (4/12/01 to open)	KPMG cannot replicate the values in the Total Service Order Cycle Time report for January 2001.	Test area included in Georgia Test. See Georgia exception 46 (4/6/00 to 12/14/00). Exception 62 (4/26/00 to 11/14/00). Exception No. 86 (5/8/00 to open). Exception No. 111 (9/11/00 to 1/5/01).

Ex.	Test #	Description	Comments
10	PMR-5 (12/4/00 to open)	KPMG has found that BST's metrics calculations for LNP reject intervals are inconsistent with the documented metrics calculations (formerly observation 12).	Not included in Georgia Test.
11	PMR-5 (12/4/00 to open)	KPMG has found that BST's metrics calculations for LNP FOC intervals are inconsistent with the documented metrics calculations	Not included in Georgia Test.
14	PMR-1 (2/27/01 to open)	BST has inconsistent retention periods of the unprocessed data that is required to calculate the LNP measurements.	Not included in Georgia Test.
15	PMR-5 (3/5/01 to open)	KPMG cannot determine whether BST is producing complete SQM reports (conflicting metrics ordered vs SQM).	Florida-specific issue.
21	PMR-5 (3/12/01 to open)	KPMG cannot replicate the values of LNP Percent Rejected Service Requests measure.	Not included in Georgia Test.
22	PMR-5 (3/12/01 to open)	KPMG cannot replicate the values of LNP Disconnect Timeliness measure.	Not included in Georgia Test.
24	PMR-5 (3/12/01 to open)	KPMG cannot replicate the values of LNP Total Service Order Cycle Time measure.	Not included in Georgia Test.
27	PMR-5 (3/12/01 to open)	KPMG cannot replicate the values of the Provisioning Troubles within 30 days of Provisioning measure. (former observation-32).	Test area included in Georgia Test. See Georgia exception 23 (2/11/00 to 1/5/01). Exception 86 (5/8/00 to open). Exception 123 (2/18/00 to 3/9/01).
36	PMR4 (3/21/01 to open)	BST does not properly construct the processed data used to validate FOC and rejection timeliness (former observation-6).	Test area included in Georgia Test. Related to exception 87 (5/23/00 to 1/5/01).

Interface Development

Obs.	Test #	Description	Comments
1	PPR-5 (7/18/00 to 3/21/01; escalated to exception)	BST does not appear to have public documentation available for CLECs to establish connectivity for TAG.	Not included in Georgia Test.
26	PPR-5 (1/9/01 to 3/21/01; escalated to exception)	No documentation for CLECS to correlate the available versions of TAG to business rules.	Not included in Georgia Test.
53	PPR-5 (3/20/01 to open)	BST does not appear to have EDI interface documentation available re batch size transmission.	Not included in Georgia Test.
54	PPR-5 (3/20/01 to open)	BST does not appear to have some TAG documentation available.	Not included in Georgia Test.

Exception	Test #	Description	Comments
1	PPR-5 (7/26/00 to 11/9/00)	BST's electronic EDI test environment is inadequate for testing of a CLEC's EDI interface (LNP).	Not included in Georgia Test.
2	PPR-5 (8/2/00 to 2/8/01)	Inconsistencies and omissions in the EDI Specs and OSS99 business rules prevent the development of an EDI interface between BST and a CLEC.	Not included in Georgia Test.
3	PPR-5 (8/4/00 to 11/9/00)	The test cases BST provides a CLEC for EDI end-to-end testing are either incomplete or incorrect.	Not included in Georgia Test.
6	PPR-5 (9/21/00 to open)	BST lacks an appropriate process, methodology and a robust test environment for testing of the EDI interface.	Not included in Georgia Test.
7	PPR-5 (10/3/00 to open)	BST does not have sufficient publicly available information that provides information to a CLEC—physical connectivity ECTA.	Not included in Georgia Test.
8	PPR-5 (10/10/00 to open)	BST lacks a consistent and documented process to enable a CLEC to independently develop an ECTA interface.	Not included in Georgia Test.

20	PPR-5 (3/12/01 to open)	BST does not appear to have public documentation available for CLECs to establish connectivity to TAG.	Not included in Georgia Test.
25	PPR-5 (3/12/01 to open)	BST does not have public documentation available to correlate available versions of TAG with business rules.	Not included in Georgia Test.

Change Management

Obs. #	Test #	Description	Comments
10	PPR-1 (10/12/00 to 2/22/01)	BST does not follow its documented process of providing proper notifications when software interfaces are being retired.	Within scope of Georgia Test, no exception issued.
21	PPR-1 (12/13/00 to 3/21/01; escalated to exception)	The distribution of carrier notification info associated with change control process is not adequate. Also significant information is not included in the notice. (See exception 23).	Within scope of Georgia Test. Related to Georgia exception 2 (11/12/99 to 7/21/00).
27	PPR-1 (1/9/01 to 3/21/01; escalated to exception)	BST does not have a clearly defined process for addressing documentation defects. (See exception 26).	Within scope of Georgia Test, no exception issued.

Except. #	Test #	Description	Comments
5	PPR-1 (8/17/00 to 1/18/01)	BST does not follow their documented process of providing proper time intervals when posting documentation changes.	Within scope of Georgia Test, no exception issued.
12	PPR-1 (2/14/01 to open)	BST does not adhere to the procedures for System Outage established in the BST change control process.	Within scope of Georgia Test, no exception issued.
23	PPR-1 (3/12/01 to open)	Carrier notification deficiencies associated with Change Control Process. (See observation 23).	Within scope of Georgia Test. Related to Georgia exception 2 (11/12/99 to 7/21/00).
26	PPR-1 3/12/01 to open)	BST does not have a clearly defined process for addressing the expedited release of BellSouth documentation defects. (See observation 27).	Within scope of Georgia Test, no exception issued.

Pre-Order, Order, and Provisioning

Obs. #	Test #	Description	Comments
29	TVV-4 (1/18/01 to 2/28/01)	BST failed to meet the frame due time on commercial CLEC loop migrations.	Included in Georgia Test. See exception 106 (8/10/00 to 3/9/01).
30	TVV-4 (1/22/01 to open)	BST UNE center does not make hot cut related calls.	Included in Georgia Test. (See Georgia exception 58 (3/30/00 to 8/4/00). Exception 82 (5/10/00 to 8/25/00).
33	TVV1 (2/1/01 to 3/21/01; escalated to exception)	BST business rules (9K) provides ambiguous information.	Not included in Georgia Test --OSS99 not tested.
37	TVV1 (2/14/01 to 3/21/01; escalated to exception)	BST business rules for ordering provides information inconsistent with system responses.	Not included in Georgia Test -- OSS99 not tested.
38	TVV-4 (2/14/01 to open)	BST issued a FOC on a XDSL/line sharing order when the loop could not support DSL service.	Not included in Georgia Test—line sharing not tested.
39	TVV-4 (2/15/01 to open)	BST did not provision the CO splitter equipment assigned to a line share order on the FOC date.	Not included in Georgia Test—line sharing not tested.
40	TVV-4 (2/15/01 to 3/7/01)	Inconsistencies in BST's process and technical documents with regard to allowable foreign voltage parameter established for xDSL loops.	Within scope of Georgia Test --PO&P 13 and 14.
41	TVV3 (2/15/01 to 3/21/01; escalated to exception)	BST flow-through documentation is incomplete and inconsistent.	Not included in Georgia Test --OSS99 not tested.
43	TVV1 (3/2/01 to open)	KPMG is unable to complete several orders using EDI interface.	Not included in Georgia Test --OSS99 not tested.
45	TVV-4 (3/6/01 to	BST returned FOC frame due times that do not match the regular hours for provisioning.	In scope of Georgia Test, no exception issued.

	open)		
46	TVV-1 (3/7/01 to open)	Business rules do not accurately describe the process for submitting orders for resale ISDN service.	Not included in Georgia Test--OSS99 not tested.
47	TVV-1 (3/7/01 to 3/28/01)	KPMG Consulting is unable to receive documents using the EDI interface.	Not included in Georgia Test --OSS99 not tested.
48	TVV-1 (3/8/01 to open)	Business rules do not offer instructions for submitting an order for DS1 with number portability.	Not included in Georgia Test --OSS99 not tested, digital UNE ordering not tested.
49	TVV-1 (3/13/01 to open; escalating to exception)	BST does not provide time stamps for LSRs for clarifications and completion notices via LENS.	Not included in Georgia Test --OSS99 not tested, LENS not tested.
52	TVV-1 (3/20/01 to open)	BST does not provide time stamps for status notices via RoboTAG.	Not included in Georgia Test— OSS99 not tested, Robo-TAG not tested.
55	TVV-1 (3/29/01 to open)	KPMG is unable to receive responses using the EDI interface.	Not included in Georgia Test --OSS99 not tested.
56	TVV-1 (4/5/01 to open)	BST implemented business rule updates prior to the release of the business rules.	In scope of Georgia Test, no exception issued.
58	TVV-1 (4/12/01 to open)	BST business rules do not allow CLECs to submit a local service request manually a SUP to an electronically submitted order.	Not included in Georgia Test --OSS99 not tested, manual ordering, other than xSDL, not tested.
59	TVV-4 (4/12/01 to open)	BellSouth does not have a documented process to reconcile a mismatch between a CLEC telephone and the Bellsouth telephone number on coordinate conversions with LNP.	In scope in Georgia Test, no exception issued.
60	TVV-1 (4/12/01 to open)	The RoboTAG interface fails to provide Miscellaneous Account Numbers (MANs) for all cities in Florida.	Not included in Georgia Test— Robo-TAG not tested. Also a state/geographic specific issue.

Except. #	Test #	Description	Comments
16	TVV-1 (3/5/01 to open)	BST business rules for ordering (9K) do not offer the ability to submit an order for the partial migration of customer's UNE loops.	Not included in Georgia Test --OSS99 not tested.

17	TVV-1 (3/6/01 to open)	BST does not offer CLECs the ability to migrate a retail customer to a CLEC using an EEL.	Not included in Georgia Test—EEL ordering not tested.
19	TVV-1 (3/12/01 to 3/22/01)	Exception withdrawn by KPMG.	Issue was outside scope of Georgia Test—involved LCSC personnel practices.
28	TVV1 (3/12/01 to open)	BST's business rules for OSS99 provide ambiguous information on use of conditional field.	Not included in Georgia Test --OSS99 not tested.
32	TVV1 (3/12/01 to open)	OSS99 business rules for ordering provides information inconsistent with the system responses being generated.	Not included in Georgia Test --OSS99 not tested.
33	TVV3 (3/12/01 to open)	BST flow-through documentation is incomplete and inconsistent.	In scope of Georgia Test. See Georgia exception 41 (3/21/00 to 8/25/00).
34	PPR8 (3/13/01 to open)	BST does not have detailed and fully documented guidelines for Customer Support Manager interaction with CLECs.	Not included in Georgia Test.
39	TVV1 (3/29/01 to open)	A field required by the business rules for ordering loop/port combinations is not provided in LENSs.	Not included in Georgia Test --LENS not tested.
40	TVV1 (4/3/01 to open)	The LENSs interface does not appropriately implement the business rules for ordering ISDN UNE loops.	Not included in Georgia Test --LENS not tested.
41	TVV1 (4/3/01 to open)	BST does not consistently apply its USOC business rules to requests for UNE switched combinations.	Within scope of Georgia Test. See Georgia exception 18 (2/15/00 to 10/5/00).
42	TVV1 (4/4/01 to open)	The TAG interface does not accurately implement the End User information requirements contained in OSS99 business rules.	Not included in Georgia Test --OSS99 not tested.
45	TVV1 (4/12/01 to open)	BellSouth Business rules for Local Ordering – OSS99, Issue 9L, contains inconsistent and incomplete instructions necessary for CLECs to access and use BellSouth's systems.	Not included in Georgia Test --OSS99 not tested.
46	TVV1 (4/12/01 to open)	Neither TAG interface, nor the EDI interface, accurately applies the business rules for directory listings forms found in the BellSouth Business Rules for Local Ordering –OSS99, Issue 9L.	Not included in Georgia Test --OSS99 not tested
48	PPR-9	BellSouth does not have formal, documented processes for capacity management in the WMC, AFIG, CO_FWG, CWINS, and NISC work centers.	Not included in Georgia Test—No work center capacity management other than xDSL.

Billing

Obs. #	Test #	Description	Comments
34	TVV10 (2/6/01 to 3/21/01; escalated to exception)	BST improperly populates "ToNumber" Field in DUF files— 611 calls—reclassified as exception 29.	See exception 29 below.
35	TVV10 (2/6/01 to 3/21/01; escalated to exception)	BST improperly populates "ToNumber" Field in ADUF files— LD calls-- reclassified as exception 30.	See exception 30 below.
36	TVV10 (2/6/01 to 3/21/01; escalated to exception)	BST failed to deliver daily usage files (DUF) records for toll- free calls—reclassified as exception 31.	See exception 30 below.
42	TVV10 (2/21/01 to open)	BST failed to deliver Daily Usage File (DUF) records for a variety of completed calls.	Included in Georgia Test. See Georgia exception 28 (2/14/00 to 3/7/01).
50	TVV-10 (3/14/01 to 4/11/01; escalating to exception)	BST incorrectly billed for unbundled usage for various call types. (Now exception 44).	See exception 44 below.
51	TVV-10 (3/15/01 to 4/11/01; escalating to exception)	BST incorrectly billed for resale usage for various call types (Now exception 43).	See exception 43 below.

Except. #	Test #	Description	Comments
13	TVV-10 (2/27/01 to open)	BST failed to deliver at least 95% of DUF records within 6 calendar days.	Included in Georgia Test. See Georgia exception 29 (2/15/00 to 8/4/00).
29	TVV10 (3/12/01 to open)	BST has improperly populated "ToNumber" field in the usage records for 611 calls in the 407 area code-- formerly observation 34.	Included in Georgia Test, no exception issued, state specific issue.

30	TVV10 (3/12/01 to open)	BST has improperly populated "ToNumber" field in the usage records for certain long distance calls. Formerly observation 35.	Included in Georgia Test, no exception issued, state specific issue.
31	TVV10 3/12/01 to open)	BST failed to deliver daily usage file records for toll free calls-- formerly observation 36.	Within scope of Georgia Test. See Georgia exception 28 (2/14/00 to 3/7/01).
37	PPR10 (3/22/01 to open)	BST's billing work center lacks a formal process for identifying and planning for variations in work load.	Not included in Georgia Test.
43	TVV11 (4/4/01 to open)	BST resale bills fail to reflect usage charges.	Within scope of Georgia Test. See Georgia exception 103 (7/27/00 to 3/23/01).
44	TVV11 (4/4/01 to open)	BST issued CABs bills which reflect incorrect quantities of switching and transport usage.	Included in Georgia Test, no exception issued.
47	TVV11 (4/12/01 to open)	KPMG CLEC bills do not reflect unbundled transport shared usage for calls made to points greater than 35 miles from the originating central office.	Included in Georgia Test, no exception issued.

Maintenance and Repair

Obs. #	Test #	Description	Comments
44	PPR-14 (3/6/01 to open)	BST does not meet the stated intervals and target objectives for maintenance for UNE Non-Designed (SL1) loops.	Appears to be included in Georgia Test. (M&R-10). No exception issued.
Except. #	Test #	Description	Comments
18	PPR-16 (3/12/01 to open)	BST network reliability center fails to provide proactive notification of network outages.	Not included in Georgia Test.
35	PPR14 (3/21/01 to open)	BST processes for responding to customer requests for earlier appointments differs between retail and wholesale centers, resulting in disparity of service.	Included in Georgia Test. (M&R-10). No exception issued.
38	TVV8 (3/27/01 to open)	BellSouth's ECTA system failed to process correctly following an outage and re-initialization.	Included in Georgia Test. (M&R-2). Potentially related to Georgia exception 20 (2/14/00 to 3/07/00).

Other Processes

Except. #	Date Issued	Description	Comments
4	PPR-2 (8/8/00 to open)	BST does not have documented procedures for interaction with CLECs during the account establishment and management process.	Not included in Georgia Test.
9	PPR-4 (11/14/00 to 4/5/01)	BST does not have documented procedures for CLEC training management practices and program administration.	Not included in Georgia Test.